

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re: ) Chapter 9  
CITY OF DETROIT, MICHIGAN, ) Case No. 13-53846  
Debtor. ) Hon. Thomas J. Tucker  
\_\_\_\_\_  
)

**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING THIS COURT'S  
SEPTEMBER 30, 2015 ORDER (DOCKET NUMBER 10219)**

The City of Detroit, Michigan ("City"), AFSCME Council 25 and Its Affiliated Detroit Locals ("AFSCME") and the Coalition of Detroit Unions ("Coalition") stipulate and agree as follows:

- A. On February 21, 2014, AFSCME filed proof of claim 2958 ("AFSCME Claim") which was comprised of 20 components. On that same date, the Coalition filed proof of claim 2851 ("Coalition Claim").
- B. On May 29, 2015, this Court entered its Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc. No. 9900).
- C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10219) ("Order").

E. After the entry of the Order, the parties continued their productive discussions regarding the resolution of the Coalition Claim and the AFSCME Claim. However, counsel to AFSCME and the Coalition has been extremely busy in mediations conducted by Judge Victoria Roberts and, as a result, the parties have not been able to conclude their discussions. Consequently, the parties request that this Court further extend the deadlines contained in the Order.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from November 30, 2015 to January 29, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from January 29, 2016, to March 30, 2016.
3. The filing deadlines in paragraph 1.C of the Order are extended from February 29, 2016, to April 29, 2016.
4. The filing deadlines in paragraph 1.D of the Order are extended from December 14, 2015 to February 12, 2016.

SO STIPULATED:

/s/ Richard G. Mack

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DATED: November 25, 2015

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**ORDER MODIFYING THIS COURT'S SEPTEMBER 30, 2015 ORDER (DOCKET  
NUMBER 10219)**

This case is before the Court on the stipulation filed on November 24, 2015, entitled “Stipulation for the Entry of an Order Modifying this Court’s September 30, 2015 Order (Docket Number 10219)” (Docket # \_\_\_\_\_, the “Stipulation”). Based on the Stipulation,

**IT IS ORDERED THAT:**

1. The Court’s September 30, 2015 Order entitled “Order Modifying Order Modifying the Court’s May 29, 2015 Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals” (Docket # 10071, the “Order”) is modified as follows:

A. The filing deadlines in paragraph 1.A of the Order are extended from November 30, 2015, to January 29, 2016.

B. The filing deadlines in paragraph 1.B of the Order are extended from January 30, 2016 to March 30, 2016.

C. The filing deadlines in paragraph 1.C of the Order are extended from February 29, 2016, to April 29, 2016.

D. The filing deadlines in paragraph 1.D of the Order are extended from December 14, 2015 to February 12, 2016.